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Attorneys for Plaintiff
ASHLEY WILSON

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ASHLEY WILSON, as an individual and on)	Case No.: C09-03630 SI
behalf of all others similarly situated,)	
)	JOINT STIPULATION AND
Plaintiff,)	PROPOSED ORDER TO EXTEND
)	SETTLEMENT CONFERENCE
v.)	DEADLINE
)	
KIEWIT PACIFIC CO., a corporation;)	
)	
Defendant.)	

Pursuant to Civil Local Rules 6-2 and 7-12, it is hereby stipulated, by and between
ASHLEY WILSON ("Plaintiff") and KIEWIT PACIFIC CO. ("Defendant") (collectively the
"Parties"), through their respective undersigned counsel, as follows:

///

1 WHEREAS, the Parties attended a Case Management Conference on February 4, 2011,
2 before Judge Susan Illston;

3 WHEREAS, the Court referred the above-captioned case to a Magistrate Judge for
4 settlement purposes, and further ordered that a settlement conference occur within 60 days;

5 WHEREAS, the Parties were referred to Magistrate Judge James Larson, who noticed a
6 settlement conference for March 22, 2010;

7 WHEREAS, Defendant is unavailable on March 22, 2010, due to a previously scheduled
8 conflict;

9 WHEREAS, Defendant contacted Judge Larson's chambers and was informed that Judge
10 Larson's next available dates for a settlement conference are May 12, 2011 and May 17, 2011;

11 WHEREAS, the Parties met and conferred and agreed to continue the Settlement
12 Conference until May 17, 2011, at 10:00 am;

13 WHEREAS, the Parties believe that an extension of the Settlement Conference deadline
14 will provide the Parties needed time to address several key issues and will maximize the chances
15 of a negotiated resolution;

16 WHEREAS, the Parties have not previously requested an extension of the Settlement
17 Conference deadline and do not believe this extension will materially alter the schedule for this
18 case;

19 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff and Defendant,
20 through their respective undersigned counsel, that the Settlement Conference deadline, currently
21 scheduled for April 5, shall be continued by 60 days.

22 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff and Defendant,
23 through their respective undersigned counsel, that the Parties will appear for Settlement
24 Conference before Judge James Larson on Tuesday, May 17, 2011, beginning at 10:00 am.

25 IT IS SO STIPULATED.
26
27
28

1 DATED: March 9, 2011

SEYFARTH SHAW LLP

2
3 By: /s/
4 Francis J. Ortman III
Ari Hersher

5 Attorneys for Defendant
6 KIEWIT PACIFIC CO.

7 DATED: March 9, 2011

LAW OFFICES OF PETER M. HART

8
9 By: /s/
10 Peter M. Hart

11 Attorneys for Plaintiff
12 ASHLEY WILSON


13
14 **[PROPOSED] ORDER EXTENDING THE SETTLEMENT CONFERENCE DEADLINE**

15 The parties having so stipulated, and GOOD CAUSE APPEARING
16 THEREFORE, IT IS HEREBY ORDERED that:

17 The Settlement Conference deadline is continued for 60 days.

18
19 PURSUANT TO STIPULATION, IT IS SO ORDERED.

20
21 Date: 3/10/10


22 The Honorable Susan Illston
23 Judge of the United States District Court